

**REMARKS**

Claims 1, 5-11 and 15-21 are pending in the application.

Claims 1, 5-11 and 15-21 are rejected.

Claims 1, 15 and 16 are amended.

Reconsideration and allowance of claims 1, 5-11 and 15-21 is respectfully requested in view of the following:

***Claim Objections***

Claims 15 and 16 are objected to under 37 CFR 1.75(c), as being of improper dependent form for failing to further limit the subject matter of a previous claim. Accordingly, claims 15 and 16 have been amended to overcome this objection. Therefore, Applicants respectfully submit that the objection to claims 15 and 16 is overcome.

***Responses to Rejections to Claims – 35 U.S.C. §103***

Claims 1, 5-6, 11, 15-17 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Agarwal et al (U.S. Patent No. 6,007,228) (Agarwal hereinafter) and "About SP-DIF or S/PDIF" by DJ Greaves (Greaves hereinafter). Claims 7-10 and 18-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Agarwal and Greaves as applied to claim 6 above, and further in view of Markow et al (U.S. Patent No. 6,359,994) (Markow hereinafter). These rejections are not applicable to the claims.

As the PTO recognizes in MPEP §2142:

The Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. If the Examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness.

The USPTO clearly cannot establish a *prima facie* case of obviousness in connection with the amended claims for the following reasons:

35 U.S.C. §103(a) provides that:

[a] patent may not be obtained...if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.... (emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, the references, alone, or in any combination, do not teach all limitations of any rejected claim.

Amended claim 1 includes, in part, “a first multi-pin docking connector in a portable portion, wherein only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder, and wherein the only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder via the unidirectional S/PDIF digital audio output.” (emphasis added).

According to the Office Action “Applicant has argued that Agarwal discloses the use of a five wire audio link, and thus does not disclose that only one audio pin is coupled to the audio coder and decoder via the digital audio output (See Page 6 Paragraph 4 – Page 7 Paragraph 3). In response, the Examiner notes that, as shown in the above rejections, Agarwal discloses that that any digital audio link can be used (See Column 89 Lines 26-50).” Paragraph 18. However, what Agarwal actually teaches at the cited sections is that any digital audio controller and analog-to-digital converter can be used with the invention. According to Agarwal “any digital audio controller and A/D converter can be used with the invention.” col. 8, lines 26-27. This does not teach a first multi-pin docking connector in a portable portion, wherein only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder, and wherein the only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder via the unidirectional S/PDIF digital audio output.

Additionally, Agarwal does not teach a docking interface with two docking connectors each using only one audio pin. Agarwal teaches a docking interface having two docking connectors each requiring 5 audio pins to transmit audio signals. According to Agarwal, a serial output is “transmitted in the 5-wire external audio link 58” which connects “master mixer 54 to external controller 86” through the docking interface. Fig. 4; col. 6, lines 48-49; col. 11, lines 23-26; col. 9, lines 65-66. The master mixer of Agarwal “has bidirectional connections to internal audio link 56 and external audio link 58” and is used to “combine both the external audio from the external microphone, CD, or line input with the FM synthesized music from the internal audio system. The combined audio from master mixer 54 can then be sent back out to external audio controller 86 over external audio link 58 for playback on the external speakers.” col. 10, lines 43-45; col. 12, lines 42-47. If Agarwal used unidirectional connections, it could not receive external audio over audio link 58, mix it, and then send it back out to be played on the external speakers over audio link 58. The Office Action states that a pair of unidirectional lines could be

used in place of a single bidirectional signal line. Paragraph 21. However, if a pair of unidirectional lines were used in place of a single bidirectional signal line, this would require more than one audio pin of the first multi-pin docking connector to be coupled to the audio coder and decoder. Accordingly, Agarwal does not teach a first multi-pin docking connector in a portable portion, wherein only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder, and wherein the only one audio pin of the first multi-pin docking connector is coupled to the audio coder and decoder via the unidirectional S/PDIF digital audio output.

As discussed above, Agarwal fails to teach key limitations of independent claim 1. Greaves and Marko fail to overcome the deficiencies of Agarwal, and the Office Action has made no argument to the contrary. For at least these reasons, it is impossible to render the subject matter of the claims as a whole obvious based on a single reference or any combination of the references, and the above explicit terms of the statute cannot be met with respect to claim 1. Independent claims 11 and 21 are patentable at least for similar reasons as described for representative claim 1. As a result, the USPTO's burden of factually supporting a *prima facie* case of obviousness clearly cannot be met with respect to claims 1, 11 and 21, and to the claims which depend therefrom.

Therefore, independent claims 1, 11 and 21, and their respective dependent claims are submitted to be allowable.

In view of all of the above, the allowance of claims 1, 5-11 and 15-21 is respectfully requested.


The amended claims are supported by the original application.

**PATENT**

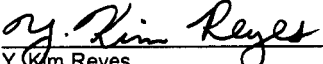
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The Examiner is invited to call the undersigned at the below-listed telephone number if a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

  
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